

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, *ex rel.*

ANTONI MUHAWI,

Plaintiff,

v.

Case No.: 18-CV-02022
Hon. Manish S. Shah

PANGEA EQUITY PARTNERS,
PANGEA EQUITY PARTNERS, LP,
PANGEA EQUITY PARTNERS II, LP,
PANGEA PROPERTIES,
PANGEA VENTURES, LLC,
PANGEA REAL ESTATE, and
PANGEA REAL ESTATE HOLDINGS, LLC,

Defendants.

JOINT STATUS REPORT

Pursuant to this Court's October 18, 2022 Minute entry (Dkt. 91), counsel for Antoni Muhawi ("Relator") and counsel for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC (together, "Defendants") (collectively, the "Parties") submit this joint status report with an update on the scheduling of Kathryn Ludwig's deposition and a revised proposed briefing schedule for the pending summary judgment motion filed by Defendants.

I. STATUS OF KATHRYN LUDWIG'S DEPOSITION

Following the Court's Minute entry (Dkt. 91) granting Defendants' motion for leave to depose Kathryn Ludwig, the Parties worked with counsel for the Chicago Housing Authority ("CHA") to schedule her deposition. The first available date that Ms. Ludwig and counsel are all available is December 6, 2022. CHA's counsel accepted service of Defendants' amended subpoena on behalf of Ms. Ludwig and will produce her for her deposition on that day.

II. PROPOSED SUMMARY JUDGMENT MOTION BRIEFING SCHEDULE

As noted above, the deposition of Ms. Ludwig is currently scheduled to take place on December 6, 2022. The Parties propose the following briefing schedule for the pending motion for summary judgment filed by Defendants: Relator will file his opposition to Defendants' summary judgment motion by February 17, 2023; and Defendants will file their reply by March 16, 2023.

Dated: November 8, 2022

HODGSON RUSS LLP

Attorneys for Plaintiff-Relator Antoni Muhawi

By: /s/Patrick E. Fitzsimmons
Daniel C. Oliverio (*pro hac vice*)
Robert J. Fluskey (*pro hac vice*)
Patrick E. Fitzsimmons (*pro hac vice*)
The Guaranty Building
140 Pearl Street, Suite 100
Buffalo, New York 14202-4040
716.856.4000
doliverio@hodgsonruss.com
rfluskey@hodgsonruss.com
pfitzsimmons@hodgsonruss.com

HOLLAND & KNIGHT LLP

Attorneys for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate and Pangea Real Estate Holdings, LLC

By: /s/Michael A. Grill
Michael A. Gill
Rachel Christine Agius
Holland & Knight
150 N. Riverside Plaza, Ste. 2700
Chicago, IL 60606
(312)263-3600
michael.grill@hklaw.com